

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)	COURT CASE NO. FSB1201452
)	
Plaintiff)	FIRST AMENDED
)	
vs.)	FELONY COMPLAINT
)	
Laurie Jean Cone , Shawna Marie Bayless , Gary Michael Gallion)	
)	DA CASE NO. 2012-00-0016840
)	
Defendant)	

The undersigned is informed and believes that:

COUNT 1

On or about April 2, 2012, in the above named judicial district, the crime of FIRST DEGREE MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Laurie Jean Cone, Shawna Marie Bayless and Gary Michael Gallion, who did unlawfully, willfully, deliberately and with premeditation, and with malice aforethought murder John Joseph Cone , a human being.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

COUNT 2

On or about April 2, 2012, in the above named judicial district, the crime of 1ST DEGREE RESIDENTIAL ROBBERY, in violation of PENAL CODE SECTION 211, a felony, was committed by Laurie Jean Cone, Shawna Marie Bayless and Gary Michael Gallion, who did unlawfully and by means of force and fear take personal property from the person, possession and immediate presence of John Joseph Cone and said offense was perpetrated in an inhabited dwelling house, trailer coach and inhabited portion of a building.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

COUNT 3

On or about April 2, 2012, in the above named judicial district, the crime of FIRST DEGREE RESIDENTIAL BURGLARY, in violation of PENAL CODE SECTION 459, a felony, was committed by Laurie Jean Cone, Shawna Marie Bayless and Gary Michael Gallion, who did enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by John Joseph Cone , with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

"NOTICE: It is further alleged that a conviction of the above offense prohibits a grant of probation pursuant to Penal Code Section 462(a), except in unusual cases where the interest of justice would best be served if probation is granted."

* * * * *

NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 3 COUNT(S).

Executed at San Bernardino, California, on April 10, 2012.

A. Tello

A. Tello

DECLARANT AND COMPLAINANT

Agency: San Bernardino Police Department

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Laurie Jean Cone	03/16/1965	1204340376		
Shawna Marie Bayless	10/09/1972		A11216233	
Gary Michael Gallion	12/18/1982		A22032274	